



State of New Jersey  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF HAZARDOUS WASTE MANAGEMENT

John J. Trela, Ph.D., Acting Director

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OCT 16 1986

Ms. Janet Feldstein  
U.S. Environmental Protection Agency  
Emergency and Remedial Response Division  
7th Floor  
26 Federal Plaza  
New York, NY 10278

RE: SCP Carlstadt Comments on the POP

Dear Ms. Feldstein:

The various offices of the NJDEP have reviewed the Project Operation Plan (POP) for the SCP Carlstadt site, and even though this should be the final document some of the concerns previously identified by NJDEP and the USEPA have not been addressed. Identified below are the outstanding concerns from NJDEP.

1. Page 6-2, 14-1 Although the contractor included trip blanks, they did not specify the use of "field blanks", as required by NJDEP at all hazardous waste sites, especially CERCLA projects. Field blanks are obtained by pouring distilled water through the appropriate sampling equipment to ensure that the bailers, trowels, augers, etc, were properly decontaminated between use. The NJDEP previously requested that at a minimum, one field blank should be provided per day of sampling, per matrix, i.e. one per water and soil samples. The analyses should duplicate the parameters specified for the matrix analyses.
2. Section 7.8.5.10 The report states that 1 or 2 clay samples will be tested for permeability. At a minimum, two samples should be tested in order to compare the data. In addition, the contractor should provide more detail as to the collection and testing procedures. For example, the contractor should follow ASTM method D1587, "Thin wall tube sample", for the sample collection.
3. Section 7.8 If water samples are filtered prior to analyses, the filter apparatus should be dedicated, or properly decontaminated between sample locations.
4. Pages 7-22, 7-29, 7-36, 7-40, 7-41, 7-46, and 7-49 The decon procedures outlined in the POP do not agree with either the NJDEP or USEPA procedures. NJDEP requires a rinse with acetone, while the USEPA specifies acetone or methanol followed by a hexane rinse. The POP identified the use of only the hexane rinse. These discrepancies should be clarified by the USEPA.

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Section 7.10.5.1 The report was not revised as per the USEPA comment that bottles with preservatives should not be immersed when taking surface water samples.

Page 7-32 As previously requested by the NJDEP, groundwater wells should be sampled 14 days after their development, not before.

Section 7.11 NJDEP requested that additional soil samples be obtained from the surface, at 0-6 inches. The report specifies that depending on the first round of samples, up to 20 additional samples may be obtained. However, this work was not identified in the project schedule.

The soil sampling program identifies that the first sample will be obtained from the 1-2 foot interval. No soil samples were proposed for the 0-12 inch interval during this program. Limited samples should be taken from this interval to determine the need for additional sampling and/or remedial actions.

8. The project schedule specifies that the slug test or injection tests would be performed before the first or second round of samples are obtained from the wells. The schedule should be revised to perform these hydraulic tests after the analytical samples are obtained, because both of these tests require the addition of water to the wells which could dilute the actual contaminant concentrations in the groundwater.
9. Figure 7-2 The NJDEP specifications for double cased wells include an 8 inch outer casing and riser pipe, not the 6 inch outer casing identified in the well construction details on figure 7-2.
10. Figure 7-3 At the meeting in September with the responsible parties, USEPA stated that the tide recorder on Peach Island Creek should be moved closer to those wells that will be equipped with the water level recorders. This figure does not appear to be revised.
11. The report is not specific whether the priority pollutant analyses includes the plus 40 library search for tentatively identified compounds. The report should be revised to include that item.
12. One of the most important comments provided by NJDEP concerns the location of the monitoring wells # 7S, 7D and 3S. These wells are located upgradient from the sources of contamination, and will not accurately depict groundwater quality. The Department has repeatedly requested that these wells be relocated downgradient from their proposed locations. Reference the coorespondence of August 19, 1986. As stated on p 7-25 of the report, the contractor will need to obtain appropriate approvals and permits from the USEPA and NJDEP before initiating the drilling. The Department remains dissatisfied with these present well locations.
13. The contractor should also be more specific regarding the type of grout to be used during the well construction, and the method of grouting, i.e. tremie or pressure grouting. Reference the August 19, 1986 correspondence.

e ensure that these comments are incorporated into the field plans before  
investigation begins. If you have any questions contact my office at  
84-3074. Thank you.

Sincerely,

*Chris Altomari*

Chris Altomari,  
Site Manager

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cc: Karen Jentis, BECM  
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